

April 17, 1995

In the Matter of Policies and Rules Regarding Minority and Female Ownership of Mass Media Facilities /

MM Docket Nos. 94-149 and 91-140

DOCKET FILE COPY ORIGINAL

- COMMENTS OF THE AMERICAN BUSINESS WOMEN'S ASSOCIATION

Thank you for your time and attention to this important issue. Women and minorities have struggled for years to achieve financial independence. As business owners, these individuals find themselves securing personal loans, borrowing from family members or relying on credit cards to keep daily business operations up and running. These women need your help.

The American Business Women's Association betters the status quo of 90,000 members nationwide. Since 1949, ABWA has brought together businesswomen of diverse occupations and provided opportunities for them to help themselves and others grow personally and professionally through leadership, education, networking support and national recognition. Our 17% of members who own businesses count on their chapters for financing ideas.

A 1994 business report survey of these members produced interesting results:

- * 69% of members' business are sole proprietorships
- * 75% of members own between 76% 100% of their business
- * 21% of owners surveyed spend \$500 \$1,000 on business training each year.

Within the survey, respondents answered the following question:

How did you finance your business start-up costs?

Of a random sample, 72.5% of the respondents claim that their costs were entirely self-financed. More than 11% of our members were forced to borrow from their families. ABWA appreciates the opportunity to aid your commentary. We look forward to the results.

Respectfully submitted,

AMERICAN BUSINESS WOMEN'S ASSOCIATION

Lynn K. Weddle Judkins

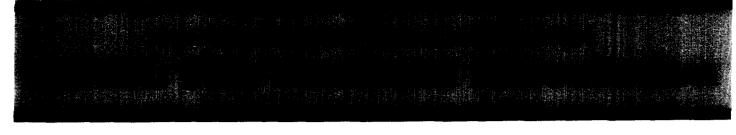
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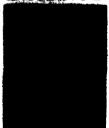


History

Business training and education are two of today's hottest issues—important issues that Hilary A. Bufton Jr., a Kansas City, Mo., businessman, realized in 1949. Mr. Bufton recognized the positive economic impact working women could have, and the need for a support organization to help reach their educational and career goals.

On September 22, 1949, Mr. Bufton founded the American Business Women's Association. ABWA has dedicated more than 40 years to women's education, and has provided workplace skills and career-development training for more than 545,000 members. It has also awarded more than \$43 million in women's scholarships.

Executive Director



Today Mr. Bufton's daughter, Carolyn Bufton Elman, carries out his vision as executive director of the American Business Women's Association. Under her direction, ABWA has produced comprehensive educational business programs for thousands of working women.

Ms. Elman is a recognized leader in American business. She offers insight in solving economic and social dilemmas of American society through Leadership America. Locally she serves on the Advisory Board for the Greater Missouri Focus on Leadership Program. She was quoted in Executive Speeches and How to Make Your Boss Work for You 1991. She is also an authority on workplace issues that affect women.

National Board of Directors



The National Board of Directors governs the affairs, policies and business of ABWA on behalf of its members. The board members also serve as trustees of

the Stephen Bufton Memorial Educational Fund (SBMEF), ABWA's national scholarship trust.

The board is composed of nine elected officers: a national president, national first vice president, national secretary-treasurer, and six district vice presidents—one from each district in the Association. They are elected to one-year terms at the annual national convention and as a board they meet three times annually.

National Observances

American Business Women's Day—Sept. 22. This day, the Association's founding date, was recognized in 1983 and 1986 by congressional resolution and a proclamation issued by President Ronald Reagan. American Business Women's Day gives all Americans an opportunity to recognize the important contributions more than 54 million American working women are making to this nation.

American Business Women's STRUT.® Chapters across the country sponsor this walking relay race throughout the year. "Strutters" are usually non-members, who are dressed in office attire and sport shoes. Proceeds from STRUTSM benefit chapter scholarship funds and SBMEF.

Annual Association Theme. Each year ABWA introduces an annual theme with a personal and chapter goal for Association members. The theme is often used as a basis for chapter programs, biannual membership campaigns and other functions throughout the year. This year's theme is "REACH."

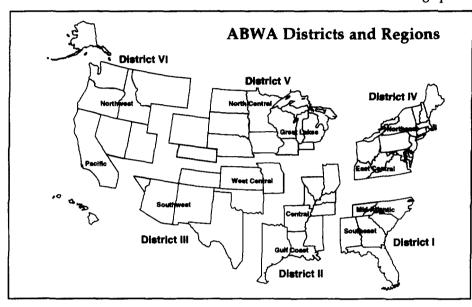
Top Ten Business Women of ABWA and American Business Woman of ABWA Awards. Each year the Association recognizes ten ABWA members as the Top Ten Business Women of ABWA from which one is chosen as the American Business Woman of ABWA. These women demonstrate how their involvement in the Association has contributed to significant career achievement. They are recognized at the Association's national convention.

To bring together businesswerren of diverse occupations and to provide appointmittles for them to help themselves and others grow personally and protessionally transign landership, education, networking support and national recognition.



National Structure

The Association is composed of six districts, and each district consists of two regions. The map below shows the break down on the ABWA districts and regions.



Upcoming Events

Twice each year, you have the opportunity to experience ABWA on a grand scale at regional spring conferences and national convention. Enjoy educational seminars, motivating speakers, leadership training sessions, interesting

tours and entertainment while networking with other members from around the country. Plan now to attend:

1995 SPRING CONFERENCES

1995 Of KING	COMPLEXEMENT
March 31-April 2	Myrtle Beach, S.C.
•	Houston, Texas
	Ontario, Calif.
April 21-23	DeKalb County
	(Atlanta), Ga.
	Nashville, Tenn.
May 5-7	Albuquerque, N.M.
	Westchester County
	(NYC), N.Y.
	Medford, Ore.
May 19-21	Shangri-La Resort,
	Okla.
	Peoria, Ill.
June 2-4	Dayton, Ohio
	Rapid City, S.D.

*Meet Our Members

Manufacturina

TOP TEN JOBS HELD BY ABWA MEMBERS:

10	r ien jobs held by Abwa membeks:	
1.	Management (not specified)	9%
2.	Administrative Assistant/Secretary	
3.	Office/Accounting Supervisor	
4 .	Accountant/Auditor/Financial Manager	4%
5.	Education/Public Administrator	3%
6.	Bookkeeper/Accounting/Payroll Clerk	3%
7.	Health Care Manager	2%
8.	Dietition/Nurse/Pharmacist/Therapist	2%
9.	Counselor/Librarian/Teacher	2%
10.	Account Executive/Sales Representative	2%
то	P INDUSTRIES FOR ABWA MEMBERS:	
1.	Service	12%
2.	Health Care	10%
3.	Banking/Finance/Insurance	10%
4.	Retail/Wholesale	10%
5.	Government/Armed Forces	8%

BU	SINESS OWNERS:	17%
13.	Agriculture/Forestry	1%
	Recreation/Entertainment	
11.	Construction/Mining	1%
10.	Publishing/Advertising/Broadcasting	2%
9.	Transportation/Public Utility	3%
8.	Real Estate	3%
7.	wanuaciumig	

RETIRED:23%

NATIONAL CONVENTIONS

1995 Portland, Ore., October 4 - 8 1996 Charlotte, N.C., September 11 - 15 1997 Minneapolis, Minn., September 20 - 24 1998 Phoenix, Ariz., September 16 - 20 1999 Kansas City, Mo., October 6 - 10

Scholarship Program

Scholarship amounts awarded 1993-1994:
Local chapter scholarships\$2,540,069
*SBMEF scholarship grants &
interest-free loans\$545,845
Total scholarships awarded\$3,085,914
*SBMEF, the Stephen Bufton Memorial Educational
Fund, is ABWA's national scholarship trust. SBMEF
has financially supported more than 11,000 women. In
fact, the trust has awarded more than \$8.5 million in
scholarship grants and interest-free loans since 1953.

Women in Business®



This award-winning national magazine of the American Business Women's Association. Women in Business® provides Association members with the latest information on business, management, health and personal finance, as well as Association news.

^{*}Information is based on member profiles collected. (81%)

BUSINESS OWNERS REPORT

WHICH INDUSTRY IS YOUR BUSINESS IN?

						•
HEALTHCARE	204	9 % /2 RECREATION/ENTERTAIN	44	2 %	Z	S
RETAIL/WHOLESALE	612	28 % 25 REAL ESTATE	107	5 %	2	
GOV/ARMED FORCES	5	.2%.5 PUBLISHING/ADVERTISE/				
EDUCATION	70	3 % 3 BROADCASTING	71	3 %	5	
SERVICE INDUSTRY	735	33 % 36 CONTRUCTION/MINING	53	2 %	3	
AGRICUTURE/FORESTRY	29	1 % Z BANKING/FINANCE/ INSURANCE	149	7 %	5	
TRANSPORTATION/ PUBLIC UTILITIES	32	1 × 2 MANUFACTURING	50	2 %		

WHAT IS THE STRUCTURE OF YOUR BUSINESS?

SOLE PROPRIETORSHIP	1427	65%	69
GENERAL PARTNERSHSIP	88	4 %	2
LIMITED PARTNERSHIP	35	2 %	3
C CORPORATION	267	12 %	11
s corporation	336	15 %	15

IS YOUR BUSINESS HOME-BASED?

YES	1063 48 %	54
NO	1133 52 %	47

IS YOUR BUSINESSS A FRANCHISE?

YES	96	4 %	4
NO	2100	96 %	97

HOW MUCH TIME DO YOU SPEND OPERATING BUSINESS?

FULL TIME 1532 70 % 7/
PART TIME 279 13 % /4

PART TIME, WHILE FULL TIME ELSEWHERE 228 10 % 9

PART TIME, WHILE PART TIME ELSEWHERE 122 6 % 6

WHAT YEAR DID YOU START/BUY YOUR BUSINESS?

3	2 %	34	1949	01 -	19
1	2 %	40	50'S	THE	IN
4	4 %	84	60'5	THE	IN
11	15 %	328	70'S	THE	IN
42	39 %	853	80'S	THE	IN
8	7 %	156	0	1990	IN
10	8 %	176	1	1991	IN
11	9 %	197	2	1992	IN
6	9 %	200	3	1993	IN
3	4 %	79	4	1994	IN

INESS OWNERS REPORT - PAGE 2

MAT IS YOUR PERCENT OF BUSINESS OWNERSHIP?

									13
	MEMBERS	WTTH	1%	~	25%	OWNERSHIP	47	2.1 %	.a
₩	MEMBERS	พากาน	26%	_	50%	OWNERSHIP	386	18 %	19
#	MEMBERS	VV 1111	Z 1 0		759	OWNERSHIP	97	4.4 %	2
#	MEMBERS	MITH	274	_	100	* OWNERSHIP	1567	71 %	75
ш	MUNICIPAL	WTTH	76%	~	TOO:	& OMMEKSUIL	1301	. –	

HOW MANY EMPLOYEES DO YOU HAVE?

ONE EMPLOYEE	212	9.65%	7 -
TWO EMPLOYEES	200	9.11%	8.5
THREE EMPLOYEES	143	6.51%	8
FOUR EMPLOYEES	109	4.96%	1.5
5 TO 10 EMPLOYEES	263	12.0%	11
11 TO 19 EMPLOYEES	85	3.87%	6
20 TO 50 EMPLOYEES	61	2.78%	- 1

DOES YOUR BUSINESS HAVE MULTIPLE LOCATIONS?

YES	275	12.5 %	9
123	1921	87.5 %	91
NO		• • • • •	, ,

IF YES, HOW MANY LOCATIONS?

	127	5.78%	5
TWO LOCATIONS	49	2.23%	2.5
THREE LOCATIONS 4 TO 10 LOCATIONS	45	2.05%	,5
11 TO 25 LOCATIONS	18	0.82%	0
26 TO 50 LOCATIONS	11	0.50%	0
51 TO 75 LOCATIONS	5	0.23%	Ø
76 TO 100 LOCATIONS	3	0.14%	0
101 TO 500 LOCATIONS	20	0.91%	0
OVER 500 LOCATIONS	5	0.23%	0

WHERE DOES YOUR BUSINESS OPERATE?

T OCALLY	1526	69.5%	67.5
LOCALLY REGIONALLY	437	10.2%	ブ
NATIONALLY	224	10.2%	7
INTERNATIONALLY	45	2.05%	3 _
ALL OF THE ABOVE	209	9.52%	10.5

WHAT IS YOUR COMPANY'S GROSS ANNUAL REVENUE?

	917	41.8%	46.5
LESS THAN \$50,000 \$50,001 TO \$100,000		16.7%	19.5
\$100,001 TO \$250,000		14.1%	8,5
\$250,001 TO \$500,000	220	10.0%	6
\$500,001 TO 1 MILLION	83	3.78%	5,5
1 MILLION TO 3 MILLION		4.28%	.5 . <u>5</u>
3 MILLION TO 5 MILLION		0.64%	, 5
MORE THAN 5 MILLION	21	0.96%	2

BUSINESS OWNER REPORT - PAGE 3

HOW DID YOU FINANCE YOUR BUSINESS START-UP COSTS?

SBA/GOVERNMENT LOAN	50	2.28%	Z
BANK LOAN	345	15.71 %	14.5
VENTURE CAPITAL	10	0.46 %	0
LINE OF CREDIT	119	5.42 _%	4.5
FAMILY LOAN	244	11.11 %	11
SELF-FINANCED	1533	69.81 %	72.5
CREDIT CARDS	172	7.83 %	ہے، جا
OTHER	104	4.74 %	6.5

HOW MUCH DO YOU SPEND ON BUSINESS TRAINING FOR YOURSELF EACH YEAR?

LESS THAN \$100	343	15.62 %	19.
\$1 00 - \$250	523	23.82 %	21
\$2 51 - \$500	515	23.45%	20
\$501 - 1000	429	19.54%	21
MORE THAN \$1000	283	12.89 %	15

ARE YOU A MEMBER OF ANY OTHER PROFESSIONAL ORGANIZATIONS?

NAT'L ASSOC WOMEN BUSINESS OWNERS	105	4.78%	5_
NAT'L ASSOC FOR SELF-EMPLOYED	92	4.19%	5,5
9 TO 5, NAT'L ASSOC OF WORKING WOMEN	5	0.23%	1
NAT'L FEDERATION INDEPENDENT BUSINESS	156	7.10 %	6
BUSINESS AND PROFESSIONAL WOMEN	114	5.19 %	4
AMERICAN WOMEN'S ECONOMIC DEVELOPEMENT	11	0.50%	1
ROTARY INTERNATIONAL	52	2.37 %	2.5
LOCAL CHAMBER COMMERCE	790	35.97%	30.5
OTHER	847	38.57 %	39.

MOW INTERESTED ARE YOU IN AN EDUCATIONAL CRUISE? 3.54 3.54

VERY INTERESTED	326	14.85%	16.
INTERESTED	189	8.61%	9.
SOMEWHAT INTERESTED	305	13.89%	12
NOT INTERESTED	204	9.29%	8.5
NOT AT ALL INTERESTED	819	37.30%	40

NOW INTERESTED ARE YOU IN A ONE DAY SEMINAR? 2.34 2.46

VERY INTERESTED	845	38.48%	36,5
INTERESTED	403	18.35%	17
SOMEWHAT INTERESTED	327	14.89%	15
NOT INTERESTED	107	4.87%	3
NOT AT ALL INTERESTED	328	14.94%	19

W INTERESTED ARE YOU IN A WEEKEND CONFERENCE? 2.96 3,10

VERY INTERESTED	464	21.13%	19.5
INTERESTED	330	15.03%	14,5
SOMEWHAT INTERESTED	424	19.31%	19
NOT INTERESTED	193	8.79%	8.5
NOT AT ALL INTERESTED	498	22.68%	27